



393299

# REILLY TAR & CHEMICAL CORPORATION

TELEPHONE: 317/638-7531  
CABLE: RETAR INDIANAPOLIS  
TELEX: 27-404



1510 MARKET SQUARE CENTER  
151 NORTH DELAWARE STREET  
INDIANAPOLIS, INDIANA 46204

July 20, 1984

LPC 11904006  
Madison County  
Granite City/Reilly Tar

RECEIVED  
JUL 27 1984

RECEIVED  
JUL 25 1984

Mr. Kenneth G. Mensing  
Southern Regional Manager  
Field Operations Section  
Division of Land Pollution Control  
117 West Main Street  
Collinsville, Illinois 62234

ILL. E.P.A. - D.L.P.C.  
STATE OF ILLINOIS

Dear Mr. Mensing:

This is in reply to your letter of July 9, 1984 received July 11, 1984 listing apparent violations at our Granite City, Illinois facility.

1. Section 725.115(b)(1) - Failure to develop and follow a schedule of inspections concerning the wastewater treatment facility.
2. Section 725.115(b)(2) - Failure to maintain the schedule at the facility.
3. Section 725.115(d) - Failure to record and maintain tank inspection logs.
4. Section 725.173(b)(5) - Failure to document inspections in the operating record.
5. Failure to inspect and/or document inspections of the wastewater treatment facility.

The above five items relating to the wastewater treatment facility do not apply in that wastewater treatment facilities are exempt under Federal regulations 265.1(c)(9) and 260.10(76)(b). Also under Illinois regulation 724.101(G)(5) and 720.110 definition of wastewater treatment unit.

6. Section 725.152(c) - Failure to describe arrangements agreed to by local authorities.

Section 725.152(c) states "The plan must describe arrangements agreed to by local police departments, fire departments, hospitals, contractors and state and local emergency response teams to coordinate emergency services, pursuant to Section 725.137.

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Mr. Kenneth G. Mensing

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July 20, 1984

Our plan does describe such an arrangement as noted in the attached document.

7. Section 722.123(a)(4) - Failure to provide agency with one copy of the manifest - it was our understanding that since the material was shipped out of state, this requirement had been dropped. We will in the future provide copies of manifest and if you wish we will forward copies of manifest for past shipments. We have reported all shipments on our annual report.
8. Section 725.116 - Failure to subject all appropriate facility personnel to the requirements of this section. In the past all personnel at the plant have received training in the use of safety equipment and proper handling of all of our materials, thus the handling of hazardous waste has been an integral part of our safety program. We have now separated it as a specific training program and all personnel involved in handling of RCRA materials have been retrained and the training documented.
9. Section 725.322 - Failure to maintain two feet of freeboard in the surface impoundment. On the weekend prior to your inspection heavy rains resulted in the lagoon level increasing so that approximately only one foot of freeboard remained. The level was subsequently lowered to the required two feet of freeboard. In addition modifications have been made in plant operating procedures such as maintaining a lower normal level and changes in pumping procedures. It should be noted that even though the level of the lagoon rose above the two foot freeboard level, no water was released outside the lagoon boundaries due to wave action or other factors.

As requested the following is an analysis for K035 listed substances on the water contained in the lagoon.

|                          |             |
|--------------------------|-------------|
| Naphthalene              | 0.0276 mg/l |
| Benzo(b)Fluoranthene     | ND          |
| Benzo(a)Pyrene           | ND          |
| Dibenzo(a)Anthracene     | ND          |
| Chrysene                 | T           |
| Fluoranthene             | 0.0358 mg/l |
| Benzo(a)Anthracene       | T           |
| Indeno (1,2,3-cd) Pyrene | ND          |
| Acenaphthalene           | T           |

# REILLY TAR & CHEMICAL CORPORATION

Mr. Kenneth G. Mensing

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July 20, 1984

As a matter of information only treated water has been discharged into the lagoon on an infrequent basis and on some occasions it was necessary to pump from the impoundment to maintain our two foot freeboard after an unusually heavy rain such as occurred prior to your inspection. Since the water in the impoundment was treated or rain water and analysis of well #2 which is in the field indicated none of the above substances in the ground-water we feel no environmental impact has resulted. Since your inspection and comments indicate a concern on your part, a policy has been instituted in which any water pumped from the impoundment will be retreated in our wastewater treatment plant prior to any discharged to the field. Additionally this is to advise you the analysis of water discharged from the wastewater treatment plant show all of the K035 listed substances to be below the limits of detectability or quantification limit.

Very truly yours,

REILLY TAR & CHEMICAL CORPORATION



W. A. Justin

Director Environmental Control

WAJ/bk

Attach.

cc: Mr. L. L. Pirtle  
Mr. D. Trieff

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EPA

## OUTSIDE EMERGENCY RESPONSE DEPARTMENTS

For purpose of definitions, outside emergency response departments are fire, police, and medical.

In the event an emergency arises requiring utilization of outside emergency response departments, the following methods of coordination shall be used and will be activated by the emergency coordinator.

1. Coordination between outside teams and in plant personnel will be carried out by the emergency coordinator and make himself available at the command post as an advisor.
2. A command post will be established at a site designated by the Granite City Fire Chief.
3. Traffic control will be coordinated by the Granite City Police.
4. Firefighting will be coordinated by the Granite City Fire Chief.
5. Overall command is delegated to the Granite City Fire Chief.
6. Emergency medical treatment will be handled by arriving ambulance personnel, and any victims requiring hospitalization will be transported to St. Elizabeth Medical Center.
7. Reilly's assistant fire chief shall direct the responding outside emergency units to the site of the emergency.

This plan has been submitted to and agreed to by the Granite City Fire Chief and the Granite City Police Chief.

In the event of a major disaster or fire, etc., it should be recognized that the outside emergency teams have the expertise necessary to handle such an emergency and Reilly's emergency coordinator would act in an advisory capacity.

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EDWARD J. REILLY  
CITY OF GRANITE CITY

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JUL 25 1984

ILL. E.P.A. - D.L.P.C.  
STATE OF ILLINOIS

# Environmental Protection Agency

117 W. Main Street Collinsville, IL. 62234

618/345-4606

CERTIFIED  
#128804

Refer to: LPC 11904006 - Madison County - Granite City/Reilly Tar & Chemical  
ILD006278360  
Compliance Inquiry Letter

July 9, 1984

Reilly Tar & Chemical Corporation  
Mr. William Justin  
1510 Market Square Center  
151 North Delaware Street Suite 150  
Indianapolis, Indiana 46204

Dear Mr. Justin:

Your facility was inspected on June 26, 1984 by M. Grant and P. M. McCarthy of this office. During the inspection, apparent violations of the Illinois Environmental Protection Act and Rules and Regulations set forth by the Illinois Pollution Control Board were revealed. The purpose of the letter is to inquire as to your position with respect to the validity of the Agency's findings and also your plans to correct the apparent violations. Enclosed with this letter is a copy of the June 26, 1984 inspection report. The following apparent violations were observed:

- Section 725.115(b)(1) - Failure to develop and follow a written schedule of inspections concerning the wastewater treatment facility.
- Section 725.115(b)(2) - Failure to maintain the schedule at the facility.
- Section 725.115(d) - Failure to record and maintain tank inspection logs.
- Section 725.116 - Failure to subject all appropriate facility personnel to the requirements of this Section.
- Section 725.152(c) - Failure to describe arrangements agreed to by local authorities.
- Section 722.123(a)(4) - Failure to provide Agency with one copy of the manifest.
- Section 725.173(b)(5) - Failure to document inspections in the Operating Record.
- Section 725.294(a)-(e) - Failure to inspect and/or document inspections of the wastewater treatment facility.
- Section 725.322 - Failure to maintain two feet of freeboard in the surface impoundment.

Additionally, we hereby request that you supply to this office analysis demonstrating that the discharge from the surface impoundment to the adjacent field is indeed nonhazardous. The analysis must be in compliance with the appropriate requirements of Title 35, Subtitle G, Waste Disposal, including, but not limited to, Section 721.103 and Appendix VII.

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July 9, 1984

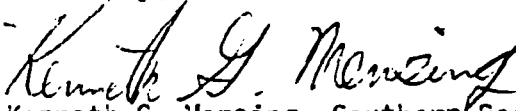
Please submit in writing, within 15 calendar days of the date of this letter, the reasons for the apparent violations outlined above, as well as a description of the steps you have instituted to prevent any further recurrence of the above cited violations. The written response should be sent to the following address:

Kenneth G. Mensing  
Illinois Environmental Protection Agency  
Division of Land Pollution Control  
117 West Main Street  
Collinsville, Illinois 62234

Further, take notice that non-compliance with the Illinois Environmental Protection Act and the Rules and Regulations adopted thereunder may be the subject of an enforcement action pursuant to Title VIII of the Illinois Environmental Protection Act, Ch. 111 1/2, Ill. Rev. Stat., Sec. 1001 et seq.

If you have any questions regarding the above, please contact me at 618/345-4606.

Sincerely,



Kenneth G. Mensing, Southern Regional Manager  
Field Operations Section  
Division of Land Pollution Control

PIM:jlr

cc: Division File  
Southern Region ✓

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Granit City / Reilly Tar & Chemical

No. 128804

RECEIPT FOR CERTIFIED MAIL

|                                       |  |                                   |
|---------------------------------------|--|-----------------------------------|
| SENT TO                               |  | POSTMARK<br>OR DATE               |
| STREET AND NO.                        |  |                                   |
| P.O., STATE AND ZIP CODE              |  |                                   |
| OPTIONAL SERVICES FOR ADDITIONAL FEES |  |                                   |
| RETURN<br>RECEIPT<br>SERVICES         | 1. Shows to whom and date delivered<br>With restricted delivery        | CONSULT<br>POSTMASTER<br>FOR FEES |
|                                       | 2. Shows to whom, date and where delivered<br>With restricted delivery |                                   |
|                                       | RESTRICTED DELIVERY  |                                   |
| SPECIAL DELIVERY (extra fee required) |  |                                   |

PS Form 3800 Jan. 1976 NO INSURANCE COVERAGE PROVIDED— (See other side)  
NOT FOR INTERNATIONAL MAIL ☆ GPO: 1975-C-591-452

Form 3811, July 1982

- SENDER: Complete Items 1, 2, 3, and 4.  
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
- ☒ Show to whom and date delivered ..... \$
- ☐ Show to whom, date, and address of delivery .. \$
2. ☐ RESTRICTED DELIVERY ..... \$  
(The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL \$

3. ARTICLE ADDRESSED TO: William Justin  
Reilly Tar & Chemical Corp.  
1510 Market Square Ctr.  
Indianapolis, Indiana 46204

|  |                |
|--|----------------|
| 4. TYPE OF SERVICE:  | ARTICLE NUMBER |
| <input type="checkbox"/> REGISTERED <input type="checkbox"/> INSURED       | 128804         |
| <input checked="" type="checkbox"/> CERTIFIED <input type="checkbox"/> COD |                |
| <input type="checkbox"/> EXPRESS MAIL                                      |                |

(Always obtain signature of addressee or agent)

I have received the article described above.

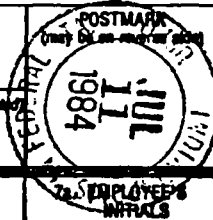
SIGNATURE ☐ Addressee ☐ Authorized agent

*P. J. Reilly*

5. DATE OF DELIVERY

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:



★ GPO: 1982-379-593

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RETURN RECEIPT